

James E. Cecchi  
CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.  
5 Becker Farm Road  
Roseland, NJ 07068  
Telephone: (973) 994-1700  
Facsimile: (973) 994-1744  
JCecchi@carellabyrne.com

Steve W. Berman  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com

*Attorneys for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

GARNER RICKMAN, ZIWEN LI, and GARY  
REISING, individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

BMW OF NORTH AMERICA LLC, a Delaware  
corporation; BAYERISCHE MOTOREN  
WERKE AKTIENGESELLSCHAFT (BMW AG),  
a corporation organized under the laws of  
Germany; ROBERT BOSCH GMBH, a  
corporation organized under the laws of Germany;  
and ROBERT BOSCH LLC, a Delaware Limited  
Liability Company,

Defendants.

Civil Action No. 18-4363 (JMV)(MF)

**COMPLAINT and  
DEMAND FOR JURY TRIAL**